

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
WASHINGTON, D.C.**

In the Matter of:

FORD MOTOR COMPANY

Respondent,

and

Case No. 07-CA-198075

LOCAL 324, INTERNATIONAL UNION OF
OPERATING ENGINEERS (IOUE), AFL-CIO

Charging Party,

and

INTERNATIONAL UNION, UNITED AUTOMOBILE,
AEROSPACE AND AGRICULTURAL IMPLEMENT
WORKERS OF AMERICA (UAW), AFL-CIO and its LOCAL 245

Intervenors

**RESPONDENT'S REQUEST FOR EXTENSION OF TIME TO
FILE EXCEPTIONS TO ALJ DECISION AND BRIEF IN SUPPORT OF EXCEPTIONS**

Pursuant to Sections 102.2 and 102.46(a) of the Rules and Regulations of the National Labor Relations Board ("Board"), Respondent Ford Motor Company ("Ford" or "Company") hereby requests an extension of time (for all parties) to file Exceptions to Administrative Law Judge David I. Goldman's Decision ("Decision"), as well as any Briefs in Support. The Decision was issued in connection with the above-styled unfair labor practice charge filed by Local 324 of the International Union of Operating Engineers ("Union"). In support of this amended request for extension of time, Ford's states the following:

1. The Decision was issued on February 8, 2018, thereby making any Exceptions to the Decision (and Supporting Briefs) due on or before March 8, 2018.

2. The undersigned counsel was retained on March 2, 2018, and has been unable to review or evaluate the record and has not had adequate time to fully evaluate the decision and prepare the Company's Exceptions and Supporting Brief for the above-captioned case by the current deadline.

3. The Union's counsel has confirmed that the Union does not oppose the requested extension.

4. Counsel for the General Counsel has indicated that he does not oppose the extension.

5. The Company respectfully requests to extend the deadline (for all parties) to file Exceptions and Supporting Briefs from March 8, 2018, to March 22, 2018.

Respectfully submitted,

/s/ Richard S. Cleary
Richard S. Cleary
rcleary@fbtlaw.com
FROST BROWN TODD LLC
400 West Market Street, 32nd Floor
Louisville, KY 40202-3363
Telephone: (502) 589-5400
Facsimile: (502) 581-1087
Counsel for Respondent
Ford Motor Company

CERTIFICATE OF SERVICE

I hereby certify that on March 7, 2018 the foregoing was served via electronic filing to the National Labor Relations Board's Office of the Executive Secretary, located at 1015 Half Street SE, Washington, DC 20570-0001, with additional service copies sent as follows:

Robert Drzyzga,
National Labor Relations Board Region 7
477 Michigan Avenue, Room 300
Detroit, MI 48226-2569
(via email at Robert.Drzyzga@nrlrb.gov)

Amy Bachelder
Sachs Waldman P.C.
2211 E. Jefferson Ave.
Detroit, MI 48207
(via email at abachelder@sachswaldman.com)

William Karges
Phillip Mayor
8000 E. Jefferson Ave.
Detroit, MI 48214
(via email at pmayor@uaw.net)

National Labor Relations Board
1015 Half Street SE
Washington, D.C. 20570-0001
(via U.S. mail)

/s/ Richard S. Cleary
Richard S. Cleary